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8 *Attorneys for Plaintiff Yotta Technologies Inc.*

9
10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 YOTTA TECHNOLOGIES INC.,

13 Plaintiff,

14 -against-

15 EVOLVE BANCORP, INC., and
16 EVOLVE BANK & TRUST,

17 Defendants.

Docket No: 3:24-cv-6456

**DECLARATION OF RISHI
BHANDARI IN SUPPORT OF
YOTTA TECHNOLOGIES
INC.'S OPPOSITION TO
DEFENDANT EVOLVE BANK
& TRUST'S MOTION TO
DISMISS**

1 I, Rishi Bhandari, declare as follows:

2 1. I am a partner in the law firm of Mandel Bhandari LLP and counsel of record for
3 Plaintiff Yotta Technologies Inc. (“Yotta”). I submit this Declaration in support of Yotta
4 Technologies Inc.’s Opposition to Defendant Evolve Bank & Trust’s Motion to Dismiss. I have
5 personal knowledge of the matters set forth in this Declaration, and if called as a witness, I could and
6 would competently testify to these matters.

7 2. Attached as **Exhibit 1** is Yotta’s proposed First Amended Complaint, showing in
8 redline all changes against the original Complaint Yotta filed on September 13, 2024 (Dkt. No.1).
9 Changes to the allegations appear on page 6 (paragraphs numbered 29-33) and on page 16 (paragraph
10 96) of Exhibit 1.

11 3. Attached as **Exhibit 2** is a clean copy of the proposed First Amended Complaint.

12 I declare under penalty of perjury that the foregoing is true and correct. Executed on January
13 23, 2025 in New York, New York.

14
15 **DATED:** New York, New York
January 23, 2025

16 By:

/s/ Rishi Bhandari

Rishi Bhandari

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